

Date: **September 17, 2014**

To: **Facility Mailing List for
Eastman Chemical Company, Tennessee Operations**

From: **Eastman Chemical Company, Tennessee Operations (Eastman)
100 South Eastman Road, Kingsport, TN
EPA ID No: TND 00 337 6928**

Subject: **Temporary Authorization**

On September 17, 2014, Eastman submitted to the Tennessee Department of Environment and Conservation, Division of Solid Waste Management (DSWM) a request for temporary authorization in accordance with Rule 0400-12-01-.07(9)(c)5(v) to operate boilers 21 or 22 with the automatic waste feed cutoff (AWFCO) system required under Hazardous Waste Management Permit TNHW-131 (the Permit) inactive for a period not to exceed 250 hours in order to conduct emissions sampling pre-testing for a Comprehensive Performance Test (CPT) to demonstrate compliance with 40 CFR Part 63, Subpart EEE, commonly referred to as the Hazardous Waste Combustor MACT (HWC MACT).

Eastman operates boilers 21 and 22 for the production of steam in support of the manufacture of chemicals, fibers and plastics. Eastman also operates these boilers under Hazardous Waste Management Permit TNHW-131 for the treatment of biosolids (referred to as biosludge) from its industrial wastewater treatment plant. Under a Comprehensive Performance Test Plan to be submitted to the Tennessee Division of Air Pollution Control (DAPC), Eastman will conduct a CPT for boilers 21 and 22 in order to establish operating parameter limits (OPL) for conditions that assure adequate hazardous waste treatment capacity while meeting applicable emission standards. The CPT will be conducted at worst-case operating conditions, including the treatment of hazardous waste. Pre-testing prior to a CPT is allowed under 40 CFR 63.1207(h)(2), provided records of the results of pre-testing are maintained. Pre-testing of the boilers is needed to provide data in support of an alternate monitoring request to be included in the CPT Plan. Pre-testing is scheduled for the week of September 29, 2014. Pre-testing will mimic operation of the boiler during the CPT. In order to achieve these operating conditions while managing hazardous waste, the AWFCO system required under the Permit must be inactive for the duration of the test, including when operating to reach steady-state operating conditions prior to stack emissions sampling. Eastman is requesting temporary authorization to conduct pre-testing with the AWFCO system inactive.

Approval of the temporary authorization will allow Eastman to conduct pre-testing that will assure emissions standards are met while generating steam to support manufacturing operations and providing adequate hazardous waste treatment capacity, thereby preventing the disruption of ongoing waste management activities. Assurance of adequate hazardous waste treatment capacity will contribute to the protection of human health and the environment by assuring on-site treatment of hazardous waste, thus eliminating the need to transport those hazardous wastes to off-site facilities. The wastes to be treated during the CPT are characteristics hazardous waste.

If you have questions concerning this request, please contact Keith Harris with Eastman at (423) 229-3926, via electronic mail at jkharris@eastman.com, or via mail at P. O. Box 511, Building 54D-6th Floor, Kingsport, Tennessee, 37662.